IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

ERIC WILLIAMS *

T/U/O Mayor & City Council

of Baltimore City *

Plaintiff * CIVIL ACTION #WMN-02-2147

-VS- *

H. D. INDUSTRIES, INC. *

Defendant *

* * * * * * * * * * * *

PLAINTIFF S MOTION TO COMPEL

NowNow comes the Plaintiff, Eric Williams, by and through his attorney, Mark E. Herman, and movesmoves this Honorable Court, pursuant to Federal Rules, to compel th Inc., to provide discovery responses, and in support thereof, states as follows:

- 1.1. On or about December 2, 2002, counsel for Plaintiff served Interrogatories and Request forfor Production of Documents on counsel for Production of Documents on counsel for the Defendanfor Fattached hereto and prayed to be incorporated as Plaintiff's Exhibit A.
 - 2. The time within which to answer the discovery has long expired.
- 3.3. Plaintiff s counsel has, on many3. Plaintiff s counsel has, on many occasio3. Plaintiff s coursel has, on many occasio3.
- 4. On March 12, 2003, Plaintiff's attorney wrote to attorney4. On March 12, 2003, Plaintiff's attorney we Defendant's Answers to Interrogatories and Responses to RequesDefendant's Answers to Interrogatory of said letter is attached hereto as Exhibit B.
 - 5.5. 5. As of this date, Defendant5. As of this date, Defendant has failed to provide Answers to Interrogatori

to Request for Production of Documents.

WHEREFORE, WHEREFORE, for the foregoing reasons, Plaintiff Eric WWHEREFORE, for the fore CourtCourt to Compel the Defendant to answer the Interrogatories and Request forCourt to Compel the Documents served on the Defendant on December 2, 2002.

MARK E. HERMAN Attorney for Plaintiff 14 W. Madison Street Baltimore, Maryland 21201 (410) 837-2144

CERTIFICATE OF GOOD FAITH EFFORTS

II HEREBY CERTIFYI HEREBY CERTIFY that I sent letters dated March 12, 2003 and I HEREBY CERT RobertRobert Bouse, Jr., on March 7, 2003 at 3:30P.M., in an attemptRobert Bouse, Jr., on March 7, 2003 at 3:30 was unsuccessful in my efforts.

MARK E. HERMAN

CERTIFICATE OF SERVICE

II HEREBY CERTIFY that onl HEREBY CERTIFY that on this 2nd day of May, 2003, a copy of this Moandand proposed Order was mailed, postage and proposed Order was mailed, postage prepaid, to Robert H. Bous King, King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney for King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney for King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney for King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney for King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney for King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney for King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney for King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney for King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney for King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney for King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney for King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney for King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney for King, LLP, 201 N. Charles Street, Suite 2000, Baltimore, Maryland 21201, attorney for King, Suite 2000, Baltimore, Maryland 21201, attorney

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	<u>OR</u>	DER G	RANT	ING PI	LAINTI	IFF S N	<u> 10TIO</u>	N TO	COMP	<u>EL</u>				
UPO	N cons	ideratio	nUPON	N consid	deration	of Plai	ntiff s N	Iotion t	o Comp	el, and	any op	positio	n thereto	o, it
day of						03, by t	he Unit	ed State	es Distri	ct Co_		day o	f	
and;														
ORE	ERED	that Pla	aintiff s	Motion	n to Con	npel is l	nereby (GRANT	TED; an	d it is fi	urther			
ORE	ERED	ORDEF	RED tha	at the D	efendan	tORDE	RED th	at the [Defenda	nt shall	have _		days fro	m th
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el.														
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<u>.</u>	Plair -vs- INDU Defe * UPO and; ORE	Plaintiff -vs- INDUSTRIE Defendant * * OR UPON cons dand; ORDERED ORDERED ersAnswers to	Plaintiff -vs- INDUSTRIES, INC. Defendant * * * ORDER G UPON consideration day of _ and; ORDERED that Plate ORDEREDORDER ersAnswers to Interrese	Plaintiff -vs- INDUSTRIES, INC. Defendant * * * * ORDER GRANT UPON considerationUPON day of and; ORDERED that Plaintiff s ORDEREDORDERED that ersAnswers to Interrogatoric	Plaintiff -vs- INDUSTRIES, INC. Defendant * * * * * ORDER GRANTING PI UPON consideration UPON CONSIDERA	Mayor & City Council ltimore City * Plaintiff * -vs- * INDUSTRIES, INC. * Defendant * * * * * * * ORDER GRANTING PLAINTI UPON consideration UPON consideration day of, 200 and; ORDERED that Plaintiff s Motion to Conton ORDEREDORDERED that the Defendant ersAnswers to Interrogatories Answers to I el	O Mayor & City Council ltimore City	Mayor & City Council litimore City * Plaintiff * CIVIL ACT -vs- * INDUSTRIES, INC. * Defendant * * * * * * * * * ORDER GRANTING PLAINTIFF S MOTIO UPON consideration UPON consideration of Plaintiff s M	Mayor & City Council ltimore City Plaintiff * CIVIL ACTION #V -vs- * INDUSTRIES, INC. * Defendant * * * * * * * * * * ORDER GRANTING PLAINTIFF S MOTION TO G UPON consideration UPON consideration of Plaintiff's Motion to day of, 2003, by the United State and; ORDERED that Plaintiff's Motion to Compel is hereby GRANTORDERED that the Defendant ORDERED th	O Mayor & City Council Itimore City	ORDER GRANTING PLAINTIFF S MOTION TO COMPEL UPON considerationUPON consideration of Plaintiff's Motion to Compel, and day of, 2003, by the United States District Coand; ORDERED that Plaintiff's Motion to Compel is hereby GRANTED; and it is for ORDEREDORDERED that the Defendant ORDERED that the Defendant shall ersAnswers to Interrogatories Answers to Interrogatories and Answers to Interrogel.	Defendant * * * * * * * * * * * * * * * * * * *	Defendant * * * * * * * * * * * * * * * * * * *	Plaintiff * CIVIL ACTION #WMN-02-2147 -vs- * INDUSTRIES, INC. * Defendant * * * * * * * * * * * * ORDER GRANTING PLAINTIFF S MOTION TO COMPEL UPON considerationUPON consideration of Plaintiff's Motion to Compel, and any opposition theret day of, 2003, by the United States District Co day of and; ORDERED that Plaintiff's Motion to Compel is hereby GRANTED; and it is further ORDEREDORDERED that the DefendantORDERED that the Defendant shall have days fro ersAnswers to Interrogatories Answers to Interrogatories and Respon el.